

**From:** Kayata, Paul [<mailto:PAUL.KAYATA@LIBERTYMUTUAL.COM>]  
**Sent:** Thursday, June 05, 2014 8:26 AM  
**To:** Michael Buckley  
**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders

Mike,

An email should be fine at this point. If I need a letter as well down the road, I'll let you know.

Fyi, the bills for the defense of DASNY are being reviewed. We'll need to discuss payment of same, as well as reimbursement to us for the ongoing defense of Gilbane.

Thanks.

Paul

**Paul Kayata, MBA | Sr. Technical Claims Specialist**

Liberty Mutual Insurance

Commercial Insurance Claims

Complex Construction Liability

Phone: 1-800-231-6165 x37000

SDN: 7337000

Fax: 888-325-8127

<image001.png>

Please send all mail correspondence to:

Liberty Mutual Insurance

P.O. Box 7214

London, KY 40742-7214

If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you received this e-mail in error, please notify me via return e-mail or via telephone 1-800-231-6165 x37000 and please permanently delete the original and any copy of any e-mail and any printout thereof. Thank you.

**From:** Michael Buckley [<mailto:MBuckley@buckleylawgroup.com>]

**Sent:** Thursday, June 05, 2014 8:21 AM

**To:** Kayata, Paul

**Cc:** Helene Dalmanieras

**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders

Paul: I have permission to do this. Is an email OK? Otherwise, I will prepare the letter.

<image002.jpg>

**Michael B. Buckley, Esq.**

**Admitted in Florida, New York and California**

*Florida – 727-822-4800*

*(direct line: 727-822-4843)*

*New York – 212-514-7400*

*Los Angeles – 310-746-9446*

[mbuckley@buckleylawgroup.com](mailto:mbuckley@buckleylawgroup.com)

[www.buckleylawgroup.com](http://www.buckleylawgroup.com)

**From:** Kayata, Paul [<mailto:PAUL.KAYATA@LIBERTYMUTUAL.COM>]

**Sent:** Wednesday, May 28, 2014 2:39 PM

**To:** Michael Buckley

**Cc:** Helene Dalmanieras

**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders

Thanks Mike.

Can I get a formal coverage position letter as it relates to AI and D&I (both primary and excess policies) for my file?

**Paul Kayata, MBA | Sr. Technical Claims Specialist**

Liberty Mutual Insurance

Commercial Insurance Claims

Complex Construction Liability

Phone: 1-800-231-6165 x37000

SDN: 7337000

Fax: 888-325-8127

<image001.png>

Please send all mail correspondence to:

Liberty Mutual Insurance

P.O. Box 7214

London, KY 40742-7214

If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you received this e-mail in error, please notify me via return e-mail or via telephone 1-800-231-6165 x37000 and please permanently delete the original and any copy of any e-mail and any printout thereof. Thank you.

**From:** Michael Buckley [<mailto:MBuckley@buckleylawgroup.com>]  
**Sent:** Wednesday, May 28, 2014 2:25 PM  
**To:** Kayata, Paul  
**Cc:** Helene Dalmanieras  
**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders

Paul: I just discussed this with client. They will agree to pick up the defense of Gilbane without any reservation going forward.

<image002.jpg>

**Michael B. Buckley, Esq.**

**Admitted in Florida, New York and California**

*Florida – 727-822-4800*

*(direct line: 727-822-4843)*

*New York – 212-514-7400*

*Los Angeles – 310-746-9446*

[mbuckley@buckleylawgroup.com](mailto:mbuckley@buckleylawgroup.com)

[www.buckleylawgroup.com](http://www.buckleylawgroup.com)

**From:** Kayata, Paul [<mailto:PAUL.KAYATA@LIBERTYMUTUAL.COM>]

**Sent:** Wednesday, May 28, 2014 12:00 PM

**To:** Michael Buckley

**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders - - Email contains a url listed on "[multi.surbl.org](http://multi.surbl.org)"

Mike,

This is, I believe, our most recent correspondence re this case. Just checking to see if the carrier has gotten back to you.

Thanks.

Paul

**Paul Kayata, MBA | Sr. Technical Claims Specialist**

Liberty Mutual Insurance

Commercial Insurance Claims

Complex Construction Liability

Phone: 1-800-231-6165 x37000

SDN: 7337000

Fax: 888-325-8127

<image001.png>

Please send all mail correspondence to:

Liberty Mutual Insurance

P.O. Box 7214

London, KY 40742-7214

If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you received this e-mail in error, please notify me via return e-mail or via telephone 1-800-231-6165 x37000 and please permanently delete the original and any copy of any e-mail and any printout thereof. Thank you.

**From:** Michael Buckley [<mailto:MBuckley@buckleylawgroup.com>]

**Sent:** Wednesday, April 16, 2014 2:46 PM

**To:** Kayata, Paul

**Cc:** Helene Dalmanieras; Natesha Salley

**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders - - Email contains a url listed on "[multi.surbl.org](http://multi.surbl.org)"

Ok, will do.

<image002.jpg>

**Michael B. Buckley, Esq.**

**Admitted in Florida, New York and California**

*Florida – 727-822-4800*

*(direct line: 727-822-4843)*

*New York – 212-514-7400*

*Los Angeles – 310-746-9446*

[mbuckley@buckleylawgroup.com](mailto:mbuckley@buckleylawgroup.com)

[www.buckleylawgroup.com](http://www.buckleylawgroup.com)

**From:** Kayata, Paul [<mailto:PAUL.KAYATA@LIBERTYMUTUAL.COM>]

**Sent:** Wednesday, April 16, 2014 10:58 AM

**To:** Michael Buckley

**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders - - Email contains a url listed on "[multi.surbl.org](http://multi.surbl.org)"

Michael,

I need some time to review the billing in more detail. I'll do so and get back to you.

Where do things stand in terms of Valiant simply accepting the tender with no reservations? All discovery to date has proven the loss arose out of Preferred's

work. The reluctance to accept straight handling is just going to result in additional costs which we will seek to recoup from Valiant. It is my understanding that DASNY has filed cross claims against Preferred as well.

Please let me know if Valiant is willing to accept straight handling in this matter.

Thanks.

Paul

**Paul Kayata, MBA | Sr. Technical Claims Specialist**

Liberty Mutual Insurance

Commercial Insurance Claims

Complex Construction Liability

Phone: 1-800-231-6165 x37000

SDN: 7337000

Fax: 888-325-8127

<image001.png>

Please send all mail correspondence to:

Liberty Mutual Insurance

P.O. Box 7214

London, KY 40742-7214



If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you received this e-mail in error, please notify me via return e-mail or via telephone 1-800-231-6165 x37000 and please permanently delete the original and any copy of any e-mail and any printout thereof. Thank you.

**From:** Michael Buckley [<mailto:MBuckley@buckleylawgroup.com>]  
**Sent:** Wednesday, April 16, 2014 10:33 AM  
**To:** Kayata, Paul  
**Cc:** Helene Dalmanieras; Natesha Salley  
**Subject:** RE: Siguencia v. CUNY, Gilbane et al v. Preferred Builders -

Paul: where do you stand on reimbursing Valiant, now that I have provided the defense bills?

<image002.jpg>

**Michael B. Buckley, Esq.**

**Admitted in Florida, New York and California**

*Florida – 727-822-4800*

*(direct line: 727-822-4843)*

*New York – 212-514-7400*

*Los Angeles – 310-746-9446*

[mbuckley@buckleylawgroup.com](mailto:mbuckley@buckleylawgroup.com)

[www.buckleylawgroup.com](http://www.buckleylawgroup.com)